

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

Maryann Mathews, Kevin Mathews
Plaintiff

v.

Wells Fargo Bank, N.A., Alias and John
Doe, Alias and Orlans Moran, PLLC
Defendants

CA No. 1:15-cv-00389-M-PAS

**ORLANS MORAN'S MOTION TO ENLARGE TIME TO RESPOND TO DISCOVERY
AND RESCHEDULE DEPOSITION OF ORLANS MORAN**

Now comes the Defendant, Orlans Moran, PLLC, in the above captioned matter, and hereby moves to enlarge the time for Orlans Moran, PLLC to respond to discovery propounded by Plaintiffs (interrogatories, document request and request for admissions) to October 31, 2016. This is the first request by the Defendant for additional time. Plaintiffs' have previously requested extensions and would not be prejudiced by such an enlargement of time since the discovery requests were propounded at or near the close of discovery.

Defendant also seeks to postpone the deposition of Orlans Moran, PLLC until after the deposition of the Plaintiffs occurring. The depositions of the Plaintiffs were noticed prior to the issuance of a deposition notice to Orlans Moran, PLLC, however, Plaintiffs' counsel has not made the Plaintiffs available for deposition. A motion to compel Plaintiffs attendance at a deposition was filed by co-defendant Wells Fargo Bank, N.A. and is pending decision by the Court.

WHEREFORE, Defendant, Orlans Moran, PLLC prays that the following relief enter:

1. The time for it to respond to the interrogatories, request for production of documents and request for admissions be enlarged to and including October 31, 2016;
2. Order that the deposition scheduled for Orlans Moran, PLLC be rescheduled to a date and time after the Plaintiffs are deposed; and
3. Such other and further relief as this Honorable Court deems meet and just.

Plaintiff
By its attorney

/s/ *Michael R. Hagopian*

Michael R. Hagopian #3448
Orlans Moran PLLC
PO Box 540540
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(781) 790-7800

15-009414

CERTIFICATE OF SERVICE

I hereby certify that, on the 20 day of September, 2016:

- ☐ I filed and served this document through the electronic filing system on the following parties:

John Ennis and David Fialkow

The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

- ☐ I served this document through the electronic filing system on the following parties:

The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

- ☐ I mailed or ☐ hand-delivered this document to the attorney for the opposing party and/or the opposing party if self-represented, whose name is _____ at the following address

/s/ Michael R. Hagopian